



GRAIN MILLERS

August 15, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave. SW
Room 4008 So., Ag Stop 0268
Washington, DC 20250

Email: National.List@usda.gov

Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07.

Grain Millers Canada Corp. thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. **We support the National List as published and would like to especially support the following substances that are used the manufacture of our 95% certified organic products:**

Name of Substance	Location on National List	Reason for Continued Allowance	Supporting Documents
Calcium Hydroxide	205.605(b)	Processing aid in the manufacture of organic sugar. Organic sugar is essential to the manufacture of our products. No organic alternative is available.	Accepted under EU 2092/91
Calcium Carbonate	205.605(a)	Source of dietary calcium. Mineral source with no organic alternative.	NOSB Processing Materials Decisions

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Phone: (306) 783-2931 Lab Fax (306) 786-5652

Natural Flavors	205.605(a)	Consumer expectation for organic equivalents of conventional flavor profiles. Dry organic flavors are not readily available.	NOSB Processing Materials Decisions
Chlorine Materials	205.605(b)	Sanitizer for food contact surfaces. No organically acceptable alternative available that performs with the efficacy of chlorine sanitizers.	NOSB Processing Materials Decisions
Nutrient Vitamins & Minerals	205.605(b)	Source of dietary vitamins & minerals. No organically acceptable form of vitamins & minerals is available.	21 CFR 104.20 NOSB Processing Materials Decisions
Gums	205.606(b)	Thickening agent. Limited organic availability.	NOSB Processing Materials Decisions

This is a very important issue to our organization and to our customers. We thank you for giving us the opportunity to comment on this critical industry issue.

Best Regards,

Chantelle Kirkham
Quality Assurance Manager
Grain Millers Canada Corp.

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